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AMENDED JOINT STIPULATION TO EXTEND TIME FOR AMERICAN EXPRESS TO RESPOND TO PLAINTIFF'S MOTION TO COMPEL DISCOVERY RESPONSES AND SUPPLEMENTAL DISCLOSURES

Plaintiff Jennafer Aycock ("Plaintiff") and defendant American Express National Bank ("American Express") (collectively, the "Parties"), through their respective attorneys of record, hereby submit their Joint Stipulation to extend time to respond to Plaintiff's Motion to Compel Discovery Responses and Supplemental Disclosures (ECF No. 52) (the "Motion"), and in support thereof state as follows:

- 1. On October 17, 2024, Plaintiff filed the Motion.
- American Express's deadline to respond to the Motion is currently 2. October 31, 2024.
- 3. Plaintiff's reply in support of the Motion is currently due November 7, 2024.
- The Parties have agreed to extend the time for American Express to respond to the Motion by eleven (11) days, up to and including November 11, 2024, with a reciprocal extension of seven (7) days to the deadline for Plaintiff to file a Reply Brief, up to and including November 25, 2024.
- 5. Good cause exists for granting this extension because the parties require additional time to facilitate resolution of this matter and resolve certain discovery disputes to conserve judicial resources.
 - 6. This extension is sought in good faith and not for the purpose of delay.
 - 7. No party will be prejudiced by the relief sought herein.

THEREFORE, IT IS HEREBY STIPULATED that the time for American Express to respond to the Motion be extended by eleven (11) days, up to and

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1	including November 11, 2024, with a reciprocal extension of seven (7) days to the	
2	deadline for Plaintiff to file a Reply Brief, up to and including November 25, 2024.	
3	Dated: November 4, 2024	KAEMPFER CROWELL
4		/s/ Sihomara Graves
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12		American Express National Bank
13		KAZEROUNI LAW GROUP, APC
		_/s/ Gustavo Ponce Gustavo Ponce
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15		Las Vegas, Nevada 89113
16		Attorney for Plaintiff Jennafer Aycock
17		
18		
19		ORDER
20	IT IS SO ORDERED.	
21		Cours 1 2 roughah
		UNITED STATES MAGISTRATE JUDGE
22		DATED: November 4, 2024
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CROWELL	AMENDED JOINT STIPULATION T	O EXTEND TIME FOR AMERICAN EXPRESS TO

RESPOND TO PLAINTIFF'S MOTION TO COMPEL DISCOVERY RESPONSES AND SUPPLEMENTAL DISCLOSURES